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MEMORANDUM

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AZ CORP COMMISSION  
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FROM: Ernest G. Johnson *ELJ*  
Director  
Utilities Division

DATE: July 9, 2003

RE: STAFF REPORT FOR RESIDENTS OF PRESCOTT VALLEY, TRACY AND  
TROY DENTON, ET. AL. VS. QWEST CORPORATION, INC. (DOCKET NO. T-  
01051B-02-0535 et al.)

Attached is the Staff Report for Residents of Prescott Valley, Tracy and Troy Denton, et.  
al. vs. Qwest Corporation, Inc.

EGJ: RLB: rdp

Originator: Richard L. Boyles

Attachment: Original and sixteen copies

Arizona Corporation Commission

DOCKETED

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**STAFF REPORT  
UTILITIES DIVISION  
ARIZONA CORPORATION COMMISSION**

**QWEST CORPORATION, INC.**

**DOCKET NO. T-01051B-02-0535 et. al.**

**STAFF**

**Engineering – Richard L. Boyles**

**CONSOLIDATED COMPLAINT**

**JUNE 2003**

### **STAFF ACKNOWLEDGMENT**

The Staff Report for QWEST Corporation, Inc., Docket No. T-01051B-02-0535 et. al. was the responsibility of the Staff members listed below: Richard L Boyles was responsible for the engineering and technical analysis.

**RICHARD L. BOYLES  
UTILITIES ENGINEER**

### EXECUTIVE SUMMARY

On July 9, and July 11, 2002, Troy and Tracy Denton, April and Bryant Peters, John H. and Patricia J. Martin, Susan Bernstein, Tommy L. White, Sandra Rodr, Kirk and Bobbi Limburg, Arnold and Tamara Fatheree, and Ernie and Sherry Thompson ("Complainants") filed various Complaints<sup>1</sup> against Qwest Corporation, Inc. ("Qwest") that basically stated that the Complainants desired phone service and Qwest refused to provide service since the properties were not located within Qwest's service territory. Qwest is an Incumbent Local Exchange Company ("ILEC") that provides telecommunications services in various communities within the state of Arizona.

The Complainant properties are all located within T-15-N, R-1-W, Section 11 which is contiguous to a portion of the northeast boundary of Qwest's Prescott Exchange. The Complainants assert that since Qwest is already providing service to at least two properties in the Section, they should be entitled to Qwest service also and not discriminated against. Qwest states that the two properties were provided service in error and that Qwest should not be compelled to provide telecommunication services beyond its service territory boundaries.

Midvale Telephone Exchange, Inc. ("Midvale") has a pending Certificate of Convenience and Necessity ("CC&N") Extension Application<sup>2</sup> which includes Section 11. Certain of the Complainants have expressed concern about the length of time that may pass before Midvale is able to offer service and whether they would receive service comparable to Qwest from Midvale. On January 22, 2003, Qwest filed a Motion to Stay the Proceedings ("Motion to Stay") until resolution of the Midvale Application. The Motion to Stay was denied by Procedural Order on May 14, 2003, and a hearing was set for this matter.

The May 14 Procedural Order directed Staff to prepare a Staff Report to address the following issues that could arise should the Commission rule in favor of the Complainants in this matter: 1) the amount of line extension charge each individual Complainant would have to pay to Qwest, 2) the amount of line extension charge each individual Complainant would have to pay to Midvale, 3) the impact on Midvale's CC&N Application if the Commission orders Qwest to serve these Complainants and 4) a comparison between Midvale and Qwest regarding each Company's services and their associated costs. Since only the Companies would be in a position to address these issues, on May 15, 2003, Staff initiated a data request to both Qwest and Midvale in order to obtain the necessary information for a comparative analysis.

On May 22, 2003, Qwest filed a *Motion for Reconsideration of Procedural Order and Motion for Protective Order* ("Motion"). In the Motion, Qwest seeks, *inter alia*, reconsideration

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<sup>1</sup> All of the Complaints were consolidated into one case by Procedural Order on August 21, 2002.

<sup>2</sup> T-02532A-03-0017.

of the portion of the Procedural Order directing Staff to prepare a Report and a Protective Order precluding Staff from discovering the information set forth in its Fourth Set of Data Requests.

On June 6, 2003, a Procedural Order was issued which denied Qwest's Motion and ordered the Company to respond to Staff's data requests.

This Staff Report summarizes the Company's responses to the issues that were delineated in the May 14, 2003 Procedural Order. Staff believes the following are considerations the ALJ should be made aware of.

1. The outcome of this proceeding could necessitate that Midvale reconsider the scope of the new service area it is requesting in its CC&N Extension Application with the potential result that some of the area initially requested by Midvale might remain unserved.
2. Since Midvale has not yet received all the necessary regulatory approvals, performed detailed pre-engineering or acquired funding for the plant additions that would be required, its estimates were broad-gauge in nature and may be subject to change.
3. Limited comparison of the line extension charges could be performed for this Report due to the incomplete response to Staff's data request due to the limited engineering performed by the companies at this time. Given the methodology that was employed, Qwest's line extension cost estimate, per Complainant, would be somewhat higher than Staff's estimate of the upper range for Midvale.
4. In general, service area boundaries for incumbent local exchange carriers ("ILECs") have been drawn along either full section or half section lines to the extent possible. Staff's historical position has been to use section boundaries.
5. Multiple ILECs currently provide service in the Prescott area so the issue of "islands of service" exists today. However, these islands are section based and not individual property based.
6. The monthly recurring cost for basic service, excluding any optional features a Complainant might order, would be lower should Qwest be the service provider.
7. There is a difference between Qwest and Midvale regarding the length of time it would take to provide service to the Complainants (approximately early 2004 versus late 2005 respectively). The difference is due, in part, to the fact that Qwest currently has facilities in adjacent sections and the requirements of Section 4.1.K of its Exchange and Network Services Price Cap Tariff.

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## ATTACHMENTS

SECTION 11 MAP <sup>3</sup> .....	Attachment A
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<sup>3</sup> Qwest response to STF 02-015S1, October 29, 2002.



## **Introduction**

On July 9, and July 11, 2002, Troy and Tracy Denton, April and Bryant Peters, John H. and Patricia J. Martin, Susan Bernstein, Tommy L. White, Sandra Rodr, Kirk and Bobbi Limburg, Arnold and Tamara Fatheree, and Ernie and Sherry Thompson ("Complainants") filed various Complaints<sup>5</sup> against Qwest Corporation, Inc. ("Qwest") that basically stated that the Complainants desired phone service and Qwest refused to provide service since the properties were not located within Qwest's service territory. Qwest is an Incumbent Local Exchange Company ("ILEC") that provides telecommunications services in various communities within the state of Arizona.

The Complainant properties are all located within T-15-N, R-1-W, Section 11 which is contiguous to a portion of the northeast boundary of Qwest's Prescott Exchange. The Complainants assert that since Qwest is already providing service to at least two properties in the Section, they should be entitled to Qwest service also and not discriminated against. Qwest states that the two properties were provided service in error and that Qwest should not be compelled to provide telecommunication services beyond its service territory boundaries.

Midvale Telephone Exchange, Inc. ("Midvale") has a pending Certificate of Convenience and Necessity ("CC&N") Extension Application<sup>6</sup> which includes Section 11. Certain of the Complainants have expressed concern about the length of time that may pass before Midvale is able to offer service and whether they would receive service comparable to Qwest from Midvale. On January 22, 2003, Qwest filed a Motion to Stay the Proceedings ("Motion to Stay") until resolution of the Midvale Application. The Motion to Stay was denied by Procedural Order on May 14, 2003, and a hearing was set for this matter.

The May 14 Procedural Order directed Staff to prepare a Staff Report to address the following issues that could arise should the Commission rule in favor of the Complainants in this matter: 1) the amount of line extension charge each individual Complainant would have to pay to Qwest, 2) the amount of line extension charge each individual Complainant would have to pay to Midvale, 3) the impact on Midvale's CC&N Application if the Commission orders Qwest to serve these Complainants and 4) a comparison between Midvale and Qwest regarding each Company's services and their associated costs. Since only the Companies would be in a position to address these issues, on May 15, 2003, Staff initiated a data request to both Qwest and Midvale in order to obtain the necessary information for a comparative analysis.

On May 22, 2003, Qwest filed a *Motion for Reconsideration of Procedural Order and Motion for Protective Order* ("Motion"). In the Motion, Qwest seeks, *inter alia*, reconsideration of the portion of the Procedural Order directing Staff to prepare a Report and a Protective Order precluding Staff from discovering the information set forth in its Fourth Set of Data Requests.

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<sup>5</sup> All of the Complaints were consolidated into one case by Procedural Order on August 21, 2002.

<sup>6</sup> T-02532A-03-0017.

On June 6, 2003, a Procedural Order was issued which denied Qwest's Motion and ordered the Company to respond to Staff's data requests.

### **Line Extension Charges**

The Companies were requested to provide an estimate of the line extension/construction charge, if any, that would be applicable to each Complainant and payable to the Company if it were the service provider. Further, the Companies were requested to provide an estimate of the cost of the plant additions that would be necessary to provide service to the Complainants. Finally, the Companies were requested to indicate if there might be any economies of scale that would benefit the Complainants if the Company were to offer service to the entire southern half of section 11<sup>7</sup>. In order to facilitate a comparison of the Company's responses, they were also requested to state the assumptions that were used to develop their estimates. Further, the Companies were asked to provide sufficient detail for Staff to verify the reasonableness of the cost estimate.

#### **A. Qwest Response**

Qwest provided its estimate as a confidential attachment to the Company's response to Staff's data request. Qwest would utilize digital loop carrier equipment to extend service to each of the Complainants. Qwest averaged its estimated cost for plant additions across all nine Complainants and then applied the \$3,000 credit as specified in its Tariff to determine the line extension charge that would be applicable for each of the Complainants.

#### **B. Midvale Response**

Midvale responded that should the Company obtain financing from the Rural Utilities Service ("RUS"), "Midvale would be precluded from charging the customers for any line-extension charges at the initial time of turning on the area". If a different source was utilized for funding Midvale would have the option of charging a line-extension charge which could amount to \$1,328. The primary assumptions that were utilized to develop the estimate were: 1) Midvale would build-out three (3) section in the Poquito Valley area, 2) there were one hundred (100) potential customers in the area, 3) the cost would be averaged equally across all potential customers and 4) 80 percent of the cost would be allocated to Midvale and 20 percent to customers.

#### **C. Staff Comments**

The Tariffs of both companies contain sections which provide for construction charges. While the verbiage is not identical in each Tariff, there are similarities in purpose and provisions. The purpose of the charges under the tariff is to prevent burdening of the general body of existing customers for facility extensions to serve new applicants. Provisions in both tariffs

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<sup>7</sup> It appears that two of the Complainant properties are located in the northern half of the section.

require the Company to determine if there are other prospective customers who might benefit from the construction, group applicants who have signed contracts together for the allocation of cost, determine each customer's pro rata share for the actual cost of construction for new facilities and depreciated cost for existing facilities and provide a credit of up to \$3,000 for each pro rata share.

Qwest's use of loop carrier to extend service to customers is not inconsistent with normal industry practice. The company's estimated cost for network additions to provide service to the Complainants appears to be within a range of reasonableness. However, a more detailed estimate of costs as typically provided to substantiate an individualized line extension quotation was not included. Staff assumes this was due to Qwest not having yet performed the necessary level of detailed engineering. Finally, the Company has not surveyed the area for other potential customers as normally would be done when applying the Tariff. The existence and interest in obtaining service of any such customers could influence the magnitude of a line extension quote. Given the methodology that was employed, Qwest's line extension cost estimate, per Complainant, would be somewhat higher than Staff's estimate of the upper range for Midvale.

Midvale's response to Staff's data request is a "best effort" high level estimate of the network additions required to extend service to three adjacent sections (one of which includes the Complainant's properties). Once the Company has obtained financing, completed construction of all necessary facilities, and actual costs and number of customers is known, the actual customer line extension cost may vary from the estimate. Further, the 80/20 percent allocation used in the estimate is not contained within the Companies tariff. Should line extension charges be determined to be applicable, then to insure that all potential customers in Midvale's service area are treated equally, the tariff provisions should be followed. This would result in the \$1,328 increasing to approximately \$3,641.

At this time, Midvale's estimated cost for network additions to provide service to the three sections appears to be within a range of reasonableness. However, Staff will make its recommendation on this issue in the docket which addresses Midvale's CC&N Extension Application. Because Midvale has not performed the detailed engineering for these sections yet, the detailed costs Staff normally would use to verify the Company's estimate are not available.

#### **Estimate of Applicable Line Extension Charges**

Table A

<b>Complainant</b>	<b>Qwest Estimate<sup>8</sup></b>	<b>Midvale Estimate</b>
Bernstein		\$0 - \$1,328
Denton		\$0 - \$1,328
Fatheree		\$0 - \$1,328
Limburg		\$0 - \$1,328
Martin		\$0 - \$1,328

<sup>8</sup> Confidential Attachment A to STF 04-REV-025.

Peters		\$0 - \$1,328
Rodr		\$0 - \$1,328
Thompson		\$0 - \$1,328
White		\$0 - \$1,328

### **Midvale's CC&N Extension Application**

The Companies were requested to provide comment on how best to differentiate the service territory of Qwest from that of Midvale should the Commission order Qwest to provide service to the Complainants and Midvale's CC&N expansion be approved in part or in its entirety.

#### **A. Qwest Response**

In its response, Qwest does not support establishment of a service area boundary on a half section line with Qwest, potentially, serving only the southern half of Section 11. If Qwest were to serve the nine Complainants, and the Order was upheld on appeal, Qwest would anticipate serving Section 11 in its entirety.<sup>9</sup> Qwest makes this determination based upon its understanding of pertinent rules and Staff's historical position on incorporating entire sections when amending service area maps.

#### **B. Midvale Response**

Midvale proposes that whichever company is designated to serve the Complainants should also serve the complete area (i.e. the section the Complainant properties are located in plus the two sections immediately to the north which are included in Midvale's CC&N Extension Application). Midvale states that in its experience, creating an island of service in the middle of another incumbents service area invites customer service problems. Examples cited were the offering of non identical services and prices and differences in access rates that could lead to differing long distance rates being made available.

Midvale also indicated that should the Commission order Qwest to service some or all of Section 11, the Company would have to re-evaluate, and perhaps withdraw, its application to serve the entire area. Midvale's current information for the three sections in question indicates that there are approximately 237 parcel owners for the whole area. For the 237 parcels owners there are about 100 structures with approximately 50 located in Section 11. Thus, if some or all of Section 11 is eliminated from Midvale's CC&N Application, there could be a drastic effect on the feasibility of providing service to the remainder of the area.

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<sup>9</sup> Qwest response to STF-04-REV-029.

### **C. Staff Comments**

In general, service area boundaries for incumbent local exchange carriers ("ILECs") have been drawn along either full section or half section lines to the extent possible. There is a historical preference to inclusion of full sections to simplify the determination of whether a property is within or outside of a service provider's service territory and minimize the opportunity for error. Further, multiple ILECs currently provide service in the Prescott area so the issue of "islands of service" exists today. However, these islands are on a multiple section basis and not based upon individual properties within a section as would be the case if Qwest were ordered to service the Complainants and Midvale were to be granted a CC&N extension for the balance of Section 11.

### **Company Services and Associated Rates**

Each Company has a Tariff on file with the Commission that provides customer information concerning all of the Company's services, their associate rates and any terms and conditions for service from the Company. Due to the volume of information presented, and the fact that Companies may market similar services by different names, it can be difficult in some instances, for a customer to differentiate between service offerings from different companies. Since the Complainants in this proceeding are individual property owners, Staff selected a sampling of common retail services, as shown in Table B below, that Staff believes would allow both the Complainants and the Administrative Law Judge ("ALJ") to make a value judgment concerning each Company's service offering.

The monthly rates for Midvale were provided in the Company's response to Staff's data request. The monthly rates for Qwest were obtained from the Company's Exchange and Network Services Tariff. The rates listed are monthly recurring charges for the services. Nonrecurring charges that occur at service initiation are not shown. Further many of the features may be available in various combinations or packages at discounted rates. Therefore, a listing of rates for individual services may not be reflective of the actual cost for selective services a Complainant might be interested in.

#### **Services and Monthly Rates**

Table B

<b>Service</b>	<b>Qwest Rate</b>	<b>Midvale Rate</b>
Residential – first line*	\$16.18	\$24.00
Residential – second line*	\$16.18	\$24.00
Business – first line*	\$20.43	\$30.00
Business – additional*	\$20.43	\$30.00
Caller ID – number	\$5.50 R, \$7.50 B	\$4.95 R, \$5.95 B
Caller ID – name and number	\$5.95 R, \$7.95 B	\$5.50 R, \$6.50 B
Caller ID – per line blocking	No Charge 1 <sup>st</sup> Time	No Charge
Call forwarding - variable	\$3.00 R, \$4.80 B	\$2.00 R, \$3.00 B

Call waiting	\$5.00 R, \$7.50 B	\$3.50
3-Way calling	\$3.50 R, \$4.00 B	Included with above
Speed call – 8 number	\$2.00 R, \$3.00 B	Included with above
Distinctive ringing	\$5.00 R, \$7.45 B	\$2.00 R, \$3.00 B
Second number service	Included with above	\$3.00 R, \$4.00 B
Toll restriction	\$0.00 R, \$5.00 B	\$2.00 R, \$3.00 B
Non-listed number	\$1.55 R, \$1.45 B	\$1.00
Non-published number	\$1.90 R, \$1.80 B	\$2.00
Voice messaging - basic	\$6.95 R, \$13.95 B	\$5.95
Voice messaging - premium	N/A	\$6.95

\* Assumes zone 2 charges are applicable for Qwest which is consistent with adjacent service territory and Qwest's response to data requests. Midvale does not use zone charges.

#### **Local Calling Area and Service Availability**

The Companies were requested to identify the communities that the Complainants would have local service to ("EAS") should the Company be the service provider for the Complainants. The Companies were also requested to address the time frames in which they would be able to provide service to the Complainants once an Order was issued in this proceeding.

##### **A. Qwest Response**

Should Qwest be the service provider for the Complainants, the local calling area would include Qwest's Chino Valley, Humboldt and Prescott Exchanges and all of the prefixes dialable from those exchanges on a local basis. Should the Company be ordered to provide service to the Complainants, Qwest states that it would provide service within six (6) months of the receipt of the customer's order.

##### **B. Midvale Response**

On the issue of local calling area, Midvale responded that it believes the Complainants should have two-way EAS to Qwest's Prescott service area. This position is consistent with what the Company stated in its CC&N Extension Application.

On the issue of when service might be made available, in its response to Staff's data request the company stated that it "wants to emphasize that delivering service to unserved areas is a complex endeavor and each particular area often hold unique features making forecasting timeframes extremely difficult." With this qualification Midvale states that it would provide service as soon as possible with construction expected to begin sometime in 2005 and take approximately six (6) months to complete.

### **C. Staff Comments**

Staff will be addressing the EAS issue as it pertains to Midvale as part of its Staff Report on Midvale's CC&N Extension Application. A recommendation on this issue will be made at that time. Qwest customers in the Prescott service area which is adjacent to the Complainants have local calling between the communities of Prescott, Chino Valley and Humboldt to certain CLEC and wireless prefixes associated with the Prescott rate center.

### **Other Issues**

The Companies were requested to provide comment on any issues they believed the Complainants should be informed of that are not addressed in the preceding discussion that might influence a Complainant's decision whether or not to order service from the Company.

#### **A. Qwest Response**

Qwest raised two issues that would arise if the Company were ordered to serve the Complainants on an interim basis until Midvale was able to serve them on a permanent basis. The first is that the Complainants would be required to take a number change in this scenario since Midvale is not required to provide local number portability. The second issue pertains to the investment Qwest would be required to make to provide service on a temporary basis and how its investment in the temporary facilities would be recovered once Midvale was providing service and Qwest's facilities were abandoned.

#### **B. Midvale Response**

Midvale responded that it was not aware of further issues.

#### **C. Staff Comments**

It is likely that any facilities that Qwest might abandon would be of little use to Midvale since Midvale would be serving from a different direction.

### **Staff Conclusions**

After review of the Company's responses, Staff believes the following are considerations the ALJ should be made aware of.

1. The outcome of this proceeding could necessitate that Midvale reconsider the scope of the new service area it is requesting in its CC&N Extension Application with the potential result that some of the area initially requested by Midvale might remain unserved.

2. Since Midvale has not yet received all the necessary regulatory approvals, performed detailed pre-engineering or acquired funding for the plant additions that would be required, its estimates were broad-gauge in nature and may be subject to change.
3. Limited comparison of the line extension charges could be performed for this Report due to the incomplete response to Staff's data request due to the limited engineering performed by the Companies at this time. Given the methodology that was employed, Qwest's line extension cost estimate, per Complainant, would be somewhat higher than Staff's estimate of the upper range for Midvale.
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7. There is a difference between Qwest and Midvale regarding the length of time it would take to provide service to the Complainants (approximately early 2004 versus late 2005 respectively). The difference is due, in part, to the fact that Qwest currently has facilities in adjacent sections and the requirements of Section 4.1.K of its Exchange and Network Services Price Cap Tariff.



*Complainants*

1 Bernstein  
103-01-207 G

2 Denton  
103-01-172 J

3 Fatheree  
103-01-225A

4 Limburg  
103-01-172 W

5 Martin  
103-01-207 C

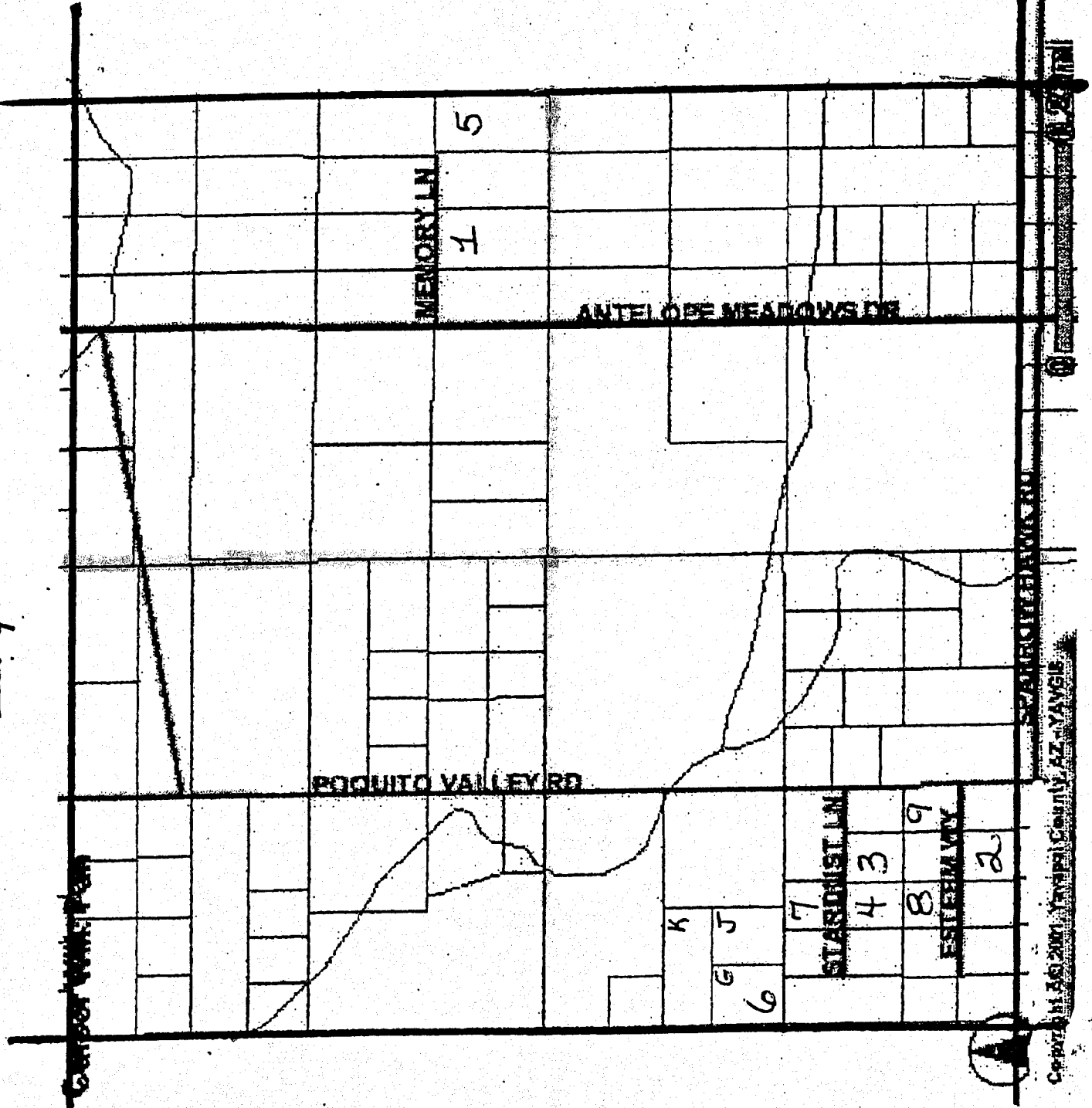
6 Petera  
103-01-192 G-J-K

7 Roda  
103-01-233A

8 Thompson  
103-01-172 S

9 White  
103-01-172 T

MN/10-24-02



511-715N-RO1W